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16 San Francisco

17 UNITED STATES BANKRUPTCY COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN FRANCISCO DIVISION

20 In re
21 THE ROMAN CATHOLIC ARCHBISHOP
OF SAN FRANCISCO,

22 Debtor and
23 Debtor in Possession.

Case No. 23-30564

Chapter 11

24 Date: June 13, 2024
Time: 1:30 p.m.
Location: Via ZoomGov
25 Judge: Hon. Dennis Montali
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28 **NOTICE OF HEARING ON DEBTOR'S THIRD MOTION FOR ORDER EXTENDING
EXCLUSIVITY PERIODS [11 U.S.C. § 1121(d)]**

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Case No. 23-30564

1 **NOTICE IS HEREBY GIVEN** that The Roman Catholic Archbishop of San Francisco,
2 debtor and debtor-in-possession herein (“Debtor”), has filed a *Third Motion for Order Extending*
3 *Exclusivity Periods* [11 U.S.C. § 1121(d)] (the “Motion”) and that a hearing on the Motion is
4 scheduled before the Honorable Dennis Montali on June 13, 2024, at 1:30 p.m. at the United States
5 Bankruptcy Court, Northern District of California, San Francisco Division (the “Hearing”). The
6 Hearing will not be conducted in the presiding judge’s courtroom but instead will be conducted by
7 videoconference via ZoomGov. The Bankruptcy Court’s website provides information regarding
8 how to arrange an appearance at a video or telephonic hearing. If you have questions about how to
9 participate in a video or telephonic hearing, you may contact the court by calling 888-821-7606 or
10 by using the Live Chat feature on the Bankruptcy Court’s website. The link to the judge’s electronic
11 calendar is: <https://www.canb.uscourts.gov/judge/montali/calendar>.

12 **NOTICE IS FURTHER GIVEN** that the Motion is supported by the *Declaration of*
13 *Joseph J. Passarello in Support of Chapter 11 Petition and Debtor’s Emergency Motions* (ECF
14 No. 14) (“Passarello Background Decl.”), the *Declaration of Paul E. Gaspari in Support of*
15 *Chapter 11 Petition and Debtor’s Emergency Motions* (ECF No. 15) (“Gaspari Decl.”), and the
16 additional *Declaration of Fr. Patrick Summerhays in support of this Motion* (“Summerhays
17 Decl.”), and the pleadings and papers on file in this case, and such other evidence and argument as
18 may be submitted before or during the hearing on the Motion.

19 By the Motion, the Debtor seeks entry of an order pursuant to 11 U.S.C. §1121(d) extending
20 the exclusivity periods within which Debtor has the exclusive right to propose a plan (which
21 currently expires on June 25, 2024) and obtain acceptance of such a plan (which currently expires
22 on August 26, 2024), until September 27, 2024 (94 days), and November 29, 2024 (95 days),
23 respectively. The Debtor believes that the relief requested is necessary and appropriate given the
24 early stage of the case, the complexity of the case, the steady progress in the postpetition
25 management of the case, and the progress toward developing a process to facilitate a plan of
26 reorganization. The requested relief is without prejudice to: (a) Debtor’s right to seek further
27 extensions and the rights of parties in interest with standing to oppose such requests, and (b) the
28 rights of parties in interest with standing to seek to shorten or terminate Debtor’s exclusivity periods

1 and Debtor's right to oppose such requests.

2 **NOTICE IS FURTHER GIVEN** that this notice does not contain all the particulars of the
3 Motion or supporting documents, nor does it summarize all of the evidence submitted in support.
4 For further specifics concerning the Motion and the relief requested, you are encouraged to review
5 the Motion and the supporting evidence, including the supporting Declarations, copies of which
6 may be obtained from the website to be maintained by the Debtor's Claims and Noticing Agent,
7 Omni Agent Solutions, Inc., at <https://omniagentsolutions.com/RCASF>, free of charge. You may
8 also access these documents from the Court's Pacer system (requires a subscription). The web page
9 address for the United States Bankruptcy Court for the Northern District of California is
10 <http://www.canb.uscourts.gov>.

11 The Bankruptcy Court's website provides information regarding how to arrange a telephonic
12 or video appearance. Counsel, parties and other interested parties may attend the hearing in person
13 or by Zoom. Additional information is available on Judge Montali's Procedures page on the court's
14 website. Information on attending the hearing by Zoom will be provided on Judge Montali's
15 calendar posted on the court's website. The link to the judge's electronic calendar is:
16 <https://www.canb.uscourts.gov/judge/montali/calendar>.

17 **NOTICE IS FURTHER GIVEN** that any opposition or response to the Motion must be
18 in writing, filed with the Bankruptcy Court, and served on the counsel for the Debtor at the above-
19 referenced addresses so as to be received by May 30, 2024. Any opposition or response must be
20 filed and served on the Limited Service List as provided in the Final Order Approving Motion to
21 (1) Establish Notice Procedures, (2) File Confidential Information Under Seal, and (3) Temporarily
22 Suspend Deadline for Filing Proofs of Claim at ECF 227. The updated Limited Service List may
23 be obtained from the Omni website listed above. Failure to file timely opposition and appear at the
24 hearing may constitute a waiver of your objections. Your rights may be affected. You should read

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1 these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case.

2 If you do not have an attorney, you may wish to consult one.

3 Dated: May 16, 2024

FELDERSTEIN FITZGERALD WILLOUGHBY
PASCUZZI & RIOS LLP

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By: /s/ Paul J. Pascuzzi

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PAUL J. PASCUZZI

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JASON E. RIOS

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THOMAS R. PHINNEY

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Attorneys for The Roman Catholic Archbishop of
San Francisco

10 Dated: May 16, 2024

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By: /s/ Ori Katz

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ORI KATZ

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ALAN H. MARTIN

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Attorneys for The Roman Catholic Archbishop of
San Francisco

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